

Privacy Policy

Last updated: December 7, 2023

Part I WHY DO WE HAVE THIS PRIVACY POLICY AND WHO ARE WE?

This **Privacy Policy** is intended to inform you about the processing of your personal data by **Style3D**. **Style3D is composed by four companies:**

- ***Linctex***, located at Havenlaan 86 C bus 204 1000 Brussel.
- ***Linctex Technology Co., Limited***, located at Rm 707 Fortress Tower 250 King's Rd North Point Hong Kong.
- ***Linctex Digital Inc***, located at 90 State street, Suite 700, OFFICE 40, ALBANY, NY 12207.
- ***Zhejiang Lingdi Digital Technology Co. Ltd***, located at 3rd Floor, Building A, Sanshen International Center, 99 Shuanglong Street, Xihu District, Hangzhou, China.

In the context of the policy, the term "you" means the individual or "data subject" whose personal data are processed by Style3D. By "**we**", "**our**" or "**us**" we mean **Style3D**, including ***Linctex***, ***Linctex Technology Co., Limited***, ***Linctex Digital Inc*** and ***Zhejiang Lingdi Digital Technology Co., Limited***.

Our core products include 3D digital modeling softwares of Style3D Fabric and Style3D Studio and a trading platform for the 3D digital garment supply chain as well as 3D digital design R&D SaaS management. We are committed to use technology to enable flexible and agile supply chain processes to meet the demand of the fashion industry in this new era.

In accordance with privacy and personal data protection regulations, in particular EU Regulation 2016/679 of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation or "GDPR"), you will find below information on the processing operations we carry out in the course of our activities. Should we ask you to provide certain information by which you can be identified when using Style3D products and services, it will only be used in accordance with this Privacy Policy.

The Privacy Policy is designed with you in mind, and it is important that you have a comprehensive understanding of our personal information collection and usage practices, as well as full confidence that ultimately, you have control of any personal information provided to Style3D.

This Privacy Policy also explains your choices surrounding how we use information about you, which include how you can object to certain uses of information about you and how you can access and update certain information about you. **If you do not agree with this policy, do not access or use our Services or interact with any other aspect of our business.** We are committed to protecting the privacy, confidentiality and security of your personal information by complying with applicable laws, including your local data protection legislation. We are equally committed to ensuring that all our employees and agents uphold these obligations. In this Privacy Policy, "personal information" or "personal data" means any information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors

specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. Such personal information includes your username, IP address, e-mail address, and information concerning you collected and/or maintained in personally identifiable form.

We do not knowingly collect Personal Information from children under the age of 16. **If you are a parent or guardian and believe your minor child has provided us with Personal Information without your consent, please contact us at privacy@style3d.com and we will take steps to delete such Personal Information from our systems.**

Ultimately, what we want is the best for all our users. Should you have any concerns with our data handling practice as summarized in this Privacy Policy or wish to exercise any of your rights concerning your personal data, please contact us at privacy@style3d.com to address your specific concerns. We will be happy to address them directly.

Part II WHAT INFORMATION IS COLLECTED AND HOW DO WE USE IT?

1. TYPES OF INFORMATION COLLECTED

We collect and process personal data of users who share information through Style3D's websites. In order to provide our services to you, we will ask you to provide personal information that is necessary to provide those services to you. We collect these information by means of cookies or by means of your contacts with us. For more information about the personal data collected by cookies, please refer to our "Cookies Policy" available on our website.

- The personal data that we collect are the following: your contact details, *i.e.* your username, email address, position and any other contact information you provide us;
- Any data you communicate to us in the context of a communication between us, including by email;
- Details of your use of our Services and the resources that you access, information about how and when you access or use our Services, such as operating date, type of browser used to access, time and number of visits;

2. WHY DO STYLE3D PROCESS YOUR PERSONAL DATA, WHAT ARE THE LEGITIMATES BASIS FOR THE PROCESSING OF YOUR PERSONAL DATA AND WHAT ARE THE STORAGE PERIODS?

If you are an individual in the European Economic Area (EEA), the personal data you provide to Style3D may be processed for the purposes listed below and on the legal basis indicated.

Your personal data are stored for as long as is necessary to achieve the purpose for which they were collected and, in any case, until the expiry of the legal retention periods, in particular for tax and accounting purposes and until the end of the limitation period for contractual liability.

Your personal data will be deleted when:

- they are no longer necessary for the purpose for which they were collected; or;
- you have validly exercised your right to erasure; or
- you have withdrawn your consent when the processing is based on the consent as legal basis.

Below we detail some of the specific legitimate basis and the storage periods of personal data in relation to those legitimate basis.

We may use your personal information for the following purposes:

a) Direct marketing

We process your personal data to offer you a full experience with Style3D, which includes among others:

- sending you information about our event, notices;
- business communication.

The legal basis for this processing is your consent.

The data processed in this context are kept as long as your consent is not withdrawn. This consent will be refreshed periodically.

b) Managing the contractual relationship and all it entails:

We process your personal data in the context of pre-contractual and contractual relations, which includes among others:

- responding to your requests for pre-contractual measures (e.g. request for information);
- performing concluded contracts with you;
- communicating with regard to requests for pre-contractual measures or concluded contracts such as updates and customer inquiry support;
- managing the billing;
- providing after-sales services

This processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into the contract.

The data processed in this context are kept for the duration of the pre-contractual and/or contractual relationship and until the end of the period of prescription of the obligations related to the contract or the precontractual phase.

c) Securing and enhancing your use of our website:

We process your personal data for (i) compiling statistic related to patterns and trends of browsing on Style3D website and (ii) implementing security.

The legal basis of these processing is the legitimate interests pursued by Style3D to collect personal data necessary for analytical purposes to improve the user's experience and Style3D website and necessary to ensure the security of its website to protect your information from unauthorized access, loss, destruction or alteration of your personal data. It is indeed the legitimate interest of Style3D to be able to ensure the security of its business operations.

The data processed in this context are kept as long as you keep using your account on our website. Once you log out or after 2 years since your last connection on your account, the data of your account will be deleted.

d) Managing your enquiries

The processing of your personal data allows us to manage any enquiries you make.

It is the legitimate interest of Style3D to be able to answer to enquiries you may have in order to give you the relevant information.

The data processed in this context are kept 1 year following their collection.

e) Managing a complaint

The processing of your data in the event of a complaint may be necessary for the performance of a contract to which you are a party or may be necessary for the performance of pre-contractual measures taken at your request or to answer to a complaint that you would lodge for another reason such as, for example, an act that you would deem to be a fault.

The data are kept for the duration of the pre-contractual and/or contractual relationship and until the end of the period of prescription of the obligations related to the contract or the precontractual phase.

Apart from the two cases mentioned above, the processing of your data in the event of a complaint is based on the legitimate interests of Style3D, which consist of being able to give the best possible follow-up to your complaint and to prevent its recurrence. This may include taking appropriate action against those within Style3D who may have made a mistake, improving internal procedures and generally improving its service. However, you may object to the processing of your data on this basis if your interests or fundamental rights and freedoms prevail over the said legitimate interests of Style3D.

The data used for the purposes mentioned in the previous paragraph are kept for a period of 18 months from the last contact with you.

f) Protecting our rights in justice

Style3D may need to process your personal data in order to enforce or defend its rights in court or in the context of a mediation.

It is the legitimate interest of Style3D to be able to defend itself in justice, especially in front of courts or in the context of a mediation.

The data processed in this context are kept for the time necessary to bring the dispute to its final conclusion and in compliance with legal obligations, in particular with regard to archiving and accounting, which may prescribe a longer period for all or part of the data kept.

g) Taking into account your rights to the protecting of your personal data

As described in detail below (see "Part II Your rights related to personal information"), the protection of your personal data is an important value for Style3D. We therefore also process your data to enable you to exercise your rights towards us and to protect your personal data.

This consideration and protection is a legal obligation, based in particular on the GDPR.

This processing, consubstantial of the purposes listed above, ceases at the same time as them.

h) Ensuring compliance with applicable legislations

The process of the personal data you provide to Style3D can be necessary for compliance with a legal obligation to which Style3D is subject, such as for tax reasons or in order to comply with accounting norms.

The data processed in this context are kept according to the duration set out by the relevant legal acts.

3. HOW DOES STYLE3D PROTECT YOUR PERSONAL DATA ?

We have put in place the necessary organizational, technical and physical measures, proportionate to the risks of infringement of your rights and freedoms, in order to protect your personal data as far as possible against unauthorized access, loss, destruction or alteration.

Our security measures are regularly evaluated and adapted in order to guarantee a high level of protection at all times.

We have implemented internal access control procedures to limit access to your data to only those persons whose intervention is necessary for the purpose of the processing.

All your personal information is stored on secure servers that are protected in controlled facilities. We classify your data based on importance and sensitivity, and ensure that your personal information has the highest security level. We make sure that our employees and Third-Party Service Providers who access the information to help provide you with our products and services are subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet such obligations. All in all, we regularly review our information collection, storage and processing practices, including physical security measures, to guard against any unauthorized access and use.

Style3D cannot be held responsible for lapses in security caused by third party accesses to your personal information as a result of your failure to keep your personal information private. Notwithstanding the foregoing, you must notify us immediately if there is any unauthorized use of your account by any other user or any other breach of security. Your assistance will help us protect your personal information.

4. WITH WHOM AND WHERE WILL STYLE3D SHARE YOUR PERSONAL DATA?

When needed, Style3D will share your personal data with public bodies, authorities and law-abiding supervisory and controlling bodies, as well as third parties such as accounting and tax affairs consultants, auditing firms, legal and departmental consultants, subsidiaries, IT assistance providers and other third parties in the context of the correct and regular pursuit of the purposes listed above, such as a marketing company. In any case, data processing by third parties must be carried out in accordance with correctness and the provisions of the law (including **GDPR and other applicable EU laws**) in force.

Any transfer of personal data to a third party inside the EU/EEA will only take place if the recipient is compliant with European privacy and personal data protection regulation.

Any transfer of personal data to a third party outside the EU/EEA will be made to a country benefitting from and adequacy decision by the Commission or, if this is not the case, will be made on the basis of the EU model clauses or similar constructions such as binding corporate rules.

In order to properly conduct our business operations and to provide you with the full functionality of our services, we may share your personal information from time to time to other Style3D affiliated companies, or our Third-Party Service Providers (including data storage facilities, data analysis service provider, etc.). Such Third-Party Service Providers would be processing your personal information on Style3D's behalf or for one or more of the purposes listed above. If you no longer wish to allow us to share this information, please contact us at privacy@style3d.com.

5. WHO IS HOSTING YOUR PERSONAL DATA ?

Your personal data is hosted by STYLE3D, which may itself use a qualified subcontractor with servers located within the European Economic Area (EEA). STYLE3D uses the service of AWS (Amazon Web Services).

These hosting solutions offer security to guarantee the confidentiality, availability and integrity of the data. The chosen subcontractor also undertakes, under the same conditions, to carry out or have carried out a backup of your data in conditions that guarantee its security and integrity, and to protect it from any damage that may occur on the servers.

Part II YOUR RIGHTS RELATED TO PERSONAL DATA

a) Your rights in general

You have, under the conditions defined by the applicable regulations, and in particular chapter 3 of the **GDPR**, the right:

- to withdraw your consent to the personal data processing at any time;
- to access the information processed (**right of access**);
- to rectify inaccurate Personal Data without undue delay and to ensure it has been completed (**right to rectification**);
- to erase/delete all your Personal Data processed without undue delay (**right to erasure; right to be forgotten**);
- to restrict our processing of your Personal Data (**right to restriction of processing**);
- to transfer your Personal Data to another controller to the extent possible (**right to data portability**);
- to object to any processing of your Personal Information carried out on the basis of our legitimate interests (**right to object**). Where we process your Personal Information for direct marketing purposes or share it with third parties for their own direct marketing purposes, you can exercise your right to object at any time to such processing without having to provide any specific reason for such objection;
- not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects ("Automated Decision-Making"). Automated Decision-Making currently does not take place on our websites.

b) Exercise of your rights

To exercise your rights, please contact us at privacy@style3d.com or send your demand to one of our postal addresses:

- *Linctex: Havenlaan 86 C bus 204 1000 Brussel;*
- *Linctex Technology Co., Limited: Room 707, Fortress Tower, 250 King's Road, North Point, Hong Kong;*
- *Linctex Digital Inc: 90 State street, Suite 700, OFFICE 40, ALBANY, NY 12207*
- *Zhejiang Lingdi Digital Technology Co., Ltd: 3rd Floor, Building A, Sanshen International Center, 99 Shuanglong Street, Xihu District, Hangzhou, China.*

We try to respond to all legitimate requests within thirty (30) days and will contact you if we need additional information from you in order to honor your request. Occasionally it may take us longer than thirty (30) days, taking into account the complexity and number of requests we receive. We will inform you in such case and the deadline of our response will be extended by a maximum of two (2) months.

Where requests are manifestly unfounded or excessive, in particular because of their repetitive nature, we may:

- charge a reasonable fee which takes into account the administrative costs incurred in providing the information, making the communication or taking the action requested; or
- refuse to comply with such requests.

The onus is on us to demonstrate that your request is manifestly unfounded or excessive.

If you contact us, we will need sufficient information from you to establish your identity and to verify your access request, and also to enable us to handle your requests.

c) Right of complaint to the data protection authority

You may also contact the competent Data Protection Authority if you consider that the processing of your personal data by Style3D is not compliant with data protection rules.

In Belgium, you may contact the Belgian Data Protection Authority on the following website:

- www.autoriteprotectiondonnees.be/ (FR);
- www.gegevensbeschermingsautoriteit.be/ (NL);
- www.dataprotectionauthority.be (EN).

You may find the Data Protection Authorities of the other EU member States on the website of the European Data Protection Board (EDPB): https://edpb.europa.eu/about-edpb/about-edpb/members_en#member-be.

Part III UPDATES TO THE PRIVACY POLICY

We keep our Privacy Policy under regular review and may update this privacy policy to reflect changes to our information practices or to comply with applicable laws. If we make material changes to our Privacy Policy, we will notify you by email (sent to the e-mail address specified in your account) or post the changes on all the Style3D websites or through our software, so that you may be aware of the information we collect and how we use it. Such changes to our Privacy Policy shall apply from the effective date as set out in the notice or on the website. We encourage you to periodically review this page for the latest information on our privacy practices. Your continued use of products and services on the websites, computer and any other device will be taken as acceptance of the updated Privacy Policy. We will submit our policy to you again before we collect more personal information from you or when we wish to use your personal information for new purposes.

Part IV HOW TO CONTACT STYLE3D ?

If you have any questions or wish to file a complaint, please feel free to email us or send us your demand to one of our postal addresses:

- privacy@style3d.com;
- *Linctex: Havenlaan 86 C bus 204 1000 Brussel*;

- *Linctex Technology Co., Limited: Room 707, Fortress Tower, 250 King's Road, North Point, Hong Kong;*
- *Linctex Digital Inc: 90 State street, Suite 700, OFFICE 40, ALBANY, NY 12207, United States of America;*
- *Zhejiang Lingdi Digital Technology Co., Ltd: 3rd Floor, Building A, Sanshen International Center, 99 Shuanglong Street, Xihu District, Hangzhou, China.*

Thank you for taking the time to understand our Privacy Policy!